

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

CYNTHIA M ROBERTS,
Debtor.

CHAPTER 13
CASE NO. 14-41886-MAR
JUDGE MARK A RANDON

**TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO
CONFIRMATION OF CHAPTER 13 PLAN**

NOW COMES the Chapter 13 Trustee, Krispen S. Carroll, and supplements her objections to confirmation of the Chapter 13 Plan in the above matter pursuant to E. D. Mich. LBR 3015-3(a) as follows:

1. Trustee requests that any Order Confirming Plan provide a date certain for the step payment proposed in Part II.B. of the Chapter 13 Plan.
2. Based upon the change in Part III.B.1. of the Chapter 13 Plan, Trustee requests that debtor's counsel file a Fee Application. Trustee notes that the Worksheet attached to the amended Plan only accounts for \$2,500.00 in fees for the entire life of the Plan.
3. Trustee objects to debtor's disclosure of debtor's income on Line 2 of the amended Means Test as based upon the documentation for the six month look back period from August 1, 2013 through January 31, 2014 the amount should be \$3,402.24 which is a difference of \$343.00.
4. Trustee objects to debtor's deductions on Line 19b and 19d as double accounting where debtor has included her non-filing spouse in the household size on Line 16.
5. Trustee objects to debtor's deductions on Line 19c for non-filing spouse's vehicle payment where debtor has accounted for two or more vehicles on Line 27a.
6. Trustee objects to debtor's mandatory retirement deduction on Line 31 of the Means Test as debtor has failed to accurately pro-rate the 401(k) loan balance over 60 months for a difference of \$92.39.
7. Trustee notes her original objections #7, #8, #9, #21 and #22 remain outstanding.

WHEREFORE, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan.

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT
Krispen S. Carroll, Chapter 13 Trustee

July 15, 2014

/s/ Margaret Conti Schmidt
KRISPEN S. CARROLL (P49817)
MARGARET CONTI SCHMIDT (P42945)
MARIA GOTSIS (P67107)
719 Griswold Street
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**CERTIFICATE OF MAILING OF
TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO
CONFIRMATION OF CHAPTER 13 PLAN**

I hereby certify that on the date indicated below, I electronically filed **TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

WILLIAM C BABUT
700 TOWNER STE 1
YPSILANTI, MI 48198-5757

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

CYNTHIA M ROBERTS
22502 FOXCROFT
WOODHAVEN, MI 48183-0000

July 17, 2014

/s/ Barbara A. Ecclestone
Barbara A. Ecclestone
For the Office of the Chapter 13 Trustee-Detroit
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